



May 29, 2008

Susan Fergien
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Subject: Development of a Long Term Irrigated Lands Regulatory Program and a Programmatic Environmental Impact Report

Dear Ms. Fergien:

On behalf of the California Waterfowl Association (CWA), I appreciate the opportunity to provide comments regarding development of a Long-Term Irrigated Lands Regulatory Program (ILRP) and a Programmatic Environmental Impact report. CWA is a charitable 501 (c)(3) organization dedicated to conserving California's waterfowl, wetlands, and outdoor heritage. We represent the interests of over 21,000 members statewide, and we are a founding partner of the Central Valley Habitat Joint Venture (CVJV). We are interested in any regulatory or non-regulatory policy actions that could affect the management and long-term viability of wetlands resources in the Central Valley and elsewhere in the state.

CWA does not own wetlands in fee title, but we work collaboratively with other members of the CVJV and private landowners to protect, restore, and enhance wetlands and associated habitats for waterfowl and other wildlife in accordance with conservation actions identified in the Joint Venture's Implementation Plan. We also support the the California Wetlands Conservation Policy goal to "ensure no overall net loss and achieve a long-term net gain in the quantity, quality, and permanence of wetlands acreage and values in California in a manner that fosters creativity, stewardship, and respect for private property" (Executive Order W-59-93).

As identified in the Scoping Document, wetlands are unique relative to irrigated lands largely because no crop is produced. The current approach to the ILRP does not recognize the many benefits of managed wetlands, including the public trust contribution they provide. CWA has participated in initial discussions with ILRP staff and other state, federal and private entities to discuss the impact of potential changes in the Long Term ILRP. These discussions have just begun, and the ecological and economic cost and benefits of potential alternatives to the Long-Term ILRP are unknown. We suggest continued discussions with Board staff and other wetland managers to better understand

how proposed changes will impact current and future wetland restoration and management activities and the wildlife that depend on them.

We look forward to working with you and your staff on the Long-Term ILRP.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Yarris", with a stylized, cursive script.

Gregory S. Yarris
Director of Conservation Policy

cc: Joe Karkoski, Regional Water Quality Control Board, Central Valley Region
Adam Laputz, Regional Water Quality Control Board, Central Valley Region